

The Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MUHAMMAD FAHD,  
  
Defendant.

No. CR17-290-RSL

**MOTION FOR ENTRY OF AN  
ORDER OF FORFEITURE**

NOTE ON MOTION CALENDAR:

September 3, 2021

The United States, by and through its undersigned counsel, moves pursuant to Federal Rule of Criminal Procedure ("Fed. R. Crim. P.") 32.2(b) and (c) for entry of an Order of Forfeiture forfeiting, to the United States, the Defendant Muhammad Fahd's interest in the following property:

A sum of money in a final amount to be determined at sentencing, but in an amount of at least \$1,824,527.37, representing a portion of the proceeds the Defendant obtained from his Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349. The United States has agreed that it will request the Attorney General apply any amounts it collects toward satisfaction of this forfeited sum to the restitution that is ordered. The United States has also agreed that any amount Defendant pays toward restitution will be credited against this forfeited sum.

1 This motion is based on the following procedural facts, which are reflected in the  
2 pleadings filed and docket entries made in this matter.

3 On September 4, 2020, the Defendant entered a plea of guilty to Conspiracy to  
4 Commit Wire Fraud, in violation of 18 U.S.C. § 1349 (Dkt. No. 56). In his plea  
5 agreement, the Defendant agreed to forfeit a sum of at least \$1,824,527.37 pursuant to 18  
6 U.S.C. § 981(a)(1)(C), by way of 28 U.S.C. § 2461(c), as it reflects a portion of the  
7 proceeds he obtained from the offense (*Id.*, ¶ 13). The Defendant also acknowledged his  
8 understanding that the United States ultimately intends to forfeit a larger sum, based on  
9 the evidence presented at sentencing (*Id.*).

10 To comply with the timing requirements of Fed. R. Crim. P. 32.2(b)(2)(B) and  
11 (b)(4)(A) – (B), the United States now moves for entry of an Order forfeiting the  
12 Defendant's interest in this sum of money. A proposed order is submitted with this  
13 motion.

14  
15 DATED this 24th day of August, 2021.

16  
17 Respectfully submitted,  
18 TESSA M. GORMAN  
19 Acting United States Attorney

20 /s/ Michelle Jensen  
21 MICHELLE JENSEN  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 24th, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically serves the ECF participants of record.

/s/ Chantelle Smith

CHANTELLE SMITH

FSA Supervisory Paralegal, Contractor

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